

DANIEL G. BOGDEN
United States Attorney
District of Nevada
PHILLIP N. SMITH, JR.
Assistant United States Attorney
Nevada State Bar No. 10233
501 Las Vegas Boulevard South
Suite 1100
Las Vegas, Nevada 89101
702-388-6336
phillip.smith@usdoj.gov

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-cr-00070-RFB
)	
Plaintiff,)	
)	
v.)	
)	
CHANDAN MANANSINGH,)	
)	
Defendant.)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Vincent Savarese, counsel for Defendant CHANDAN MANANSINGH, that the date for the Government to file a response to the Defendant's Motion to Suppress (Docket #36) be extended for five (5) days.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on November 4, 2016.

1 2. A hearing regarding a stipulation for extension of time was held on November 23,
2 2016. Pursuant to the Court's Order, the Government's response deadline is
3 December 7, 2016.

4 4. Counsel for the Government is presently in trial in the matter of *United States v.*
5 *Kenneth Earl Brooks*, 2:16-cr-00193-KJD-VCF. The trial, along with pre-trial
6 preparation, has taken away from time needed to research and prepare a response
7 to the Defendant's Motion.

8 5. The Defendant is incarcerated, but he does not object to a brief continuance of the
9 Government's response deadline.

10 6. The trial in this matter is presently set for February 6, 2017.

11 7. The additional time requested herein is not sought for purposes of delay, but
12 merely to allow the Government adequate time to prepare a response to the
13 Defendant's Motion, taking into account due diligence.

14 8. Additionally, denial of this request for continuance could result in a miscarriage
15 of justice.

16 9. This is the second stipulation filed herein to continue the Government's response
17 deadline.

18 DATED: December 6, 2016.

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20
21
22
23 /s/_____
24 PHILLIP N. SMITH, JR.
25 Assistant United States Attorney
26 Counsel for the United States

 /s/_____
VINCENT SAVARESE
Counsel for Defendant MANANSINGH

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 * * *

4
5 UNITED STATES OF AMERICA,) **2:15-cr-00070-RFB**
6 Plaintiff,)
7 v.)
8 CHANDAN MANANSINGH,)
9 Defendant.)
10)
11

12 **FINDINGS OF FACT**

13 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
14 Court finds that:

- 15 3. The Defendant's Motion was filed and served on November 4, 2016.
- 16 4. A hearing regarding a stipulation for extension of time was held on November 23,
17 2016. Pursuant to the Court's Order, the Government's response deadline is
18 December 7, 2016.
- 19 4. Counsel for the Government is presently in trial in the matter of *United States v.*
20 *Kenneth Earl Brooks*, 2:16-cr-00193-KJD-VCF. The trial, along with pre-trial
21 preparation, has taken away from time needed to research and prepare a response
22 to the Defendant's Motion.
- 23 5. The Defendant is incarcerated, but he does not object to a brief continuance of the
24 Government's response deadline.
- 25 6. The trial in this matter is presently set for February 6, 2017.
- 26 7. The additional time requested herein is not sought for purposes of delay, but
27 merely to allow the Government adequate time to prepare a response to the
28 Defendant's Motion, taking into account due diligence.

1 8. Additionally, denial of this request for continuance could result in a miscarriage
2 of justice.

3 9. This is the second stipulation filed herein to continue the Government's response
4 deadline.

5 For all of the above-stated reasons, the ends of justice would best be served by a
6 continuance of the motion response deadline.

7 **CONCLUSIONS OF LAW**

8 The additional time requested herein is not sought for purposes of delay, but merely to
9 allow the Government adequate time to research and prepare a response to the Defendant's
10 Motion, taking into account due diligence. The failure to grant said continuance would likely
11 result in a miscarriage of justice.

12 **ORDER**

13 IT IS THEREFORE ORDERED, that the previously-scheduled response deadline for the
14 Government to respond to the Defendant's Motion to Suppress is extended until
15 December 12, 2016. The Defendant's optional reply will be due ten (10) days
16 thereafter.

17 

18 _____
19 RICHARD F. BOULWARE, II
20 United States District Judge

21 DATED: December 15, 2016.